

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VERNA IP HOLDINGS, LLC,

Plaintiff,

v.

ALERT MEDIA, INC.,

Defendant.

C.A. No. 6:21-cv-00422-ADA

JURY TRIAL DEMANDED

FILED UNDER SEAL

VERNA IP HOLDINGS, LLC,

Plaintiff,

v.

ALERT MEDIA, INC.,

Defendant.

C.A. No. 6:22-cv-00387-ADA

JURY TRIAL DEMANDED

FILED UNDER SEAL

SUPPLEMENTAL DECLARATION OF DAVID B. CONRAD

I, David B. Conrad, declare as follows:

1. I am over the age of 21 and fully competent to make this declaration. I have personal knowledge of the facts stated herein and they are all true and correct.

2. This Supplemental Declaration is intended to supplement the Declaration I provided on March 27, 2023 to include information about additional attorneys' fees billed to Alert Media.

3. Exhibits 16 and 17 show additional attorneys' fees incurred leading up to and while preparing Alert Media's motion that were billed to Alert Media after its motion was filed. The hours expended in Exhibits 16 and 17 (as well as the invoices of Exhibits 11 and 12 submitted with my prior declaration) were actually expended on the topics stated, and for the same reasons set forth in my prior declaration these hours were reasonable and necessary.

4. Alert Media incurred overall \$ [REDACTED] in attorneys' fees requested under this motion for the first case against Alert Media. Alert Media incurred \$ [REDACTED] in attorneys' fees requested under this motion for the Second Case against Alert Media. A true and correct summary table for each case showing the total requested amount of attorneys' fees billed to Alert Media in these matters is attached hereto as Exhibits 18 and 19. These attorneys' fees figures have been updated from Exhibits 11 and 12.

FURTHER DECLARANT SAYETH NOT.

I declare, under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed May 15, 2023.

/s/ David B. Conrad

David B. Conrad